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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. **2010-456**

13 **DAVID ROY NICHOLAS**
4001 Harlam Ranch
Clovis, CA 93619

A C C U S A T I O N

14 **Registered Nurse License No. 598027**

15 Respondent.

16
17 Louise R. Bailey, M.Ed., RN (Complainant) alleges

18 **PARTIES**

- 19 1. Complainant brings this Accusation solely in her official capacity as the Interim
20 Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.
- 21 2. On or about April 16, 2002, the Board of Registered Nursing issued Registered Nurse
22 License Number 598027 to David Roy Nicholas (Respondent). The Registered Nurse License
23 was in full force and effect at all times relevant to the charges brought herein and will expire on
24 October 31, 2011, unless renewed.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct)**

3 9. Respondent is subject to discipline under Code section 2761(a), on the grounds of
4 unprofessional conduct, in that on or about January 30, 2008, while a licensed registered nurse at
5 Saint Agnes Medical Center, located in Fresno, California, Respondent practiced outside the
6 scope of practice of a registered nurse by performing a suturing procedure on Colombini's hand.

7 **PRAYER**

8 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,
9 and that following the hearing, the Board of Registered Nursing issue a decision:

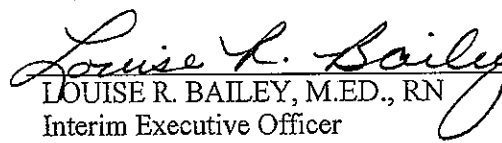
10 1. Revoking or suspending Registered Nurse License Number 598027, issued to David
11 Roy Nicholas;

12 2. Ordering David Roy Nicholas to pay the Board of Registered Nursing the reasonable
13 costs of the investigation and enforcement of this case, pursuant to Business and Professions
14 Code section 125.3; and,

15 3. Taking such other and further action as deemed necessary and proper.

16
17 DATED: _____

3/18/10


LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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